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Attorneys for Defendant  
HYUNDAI MERCHANT MARINE CO., LTD.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
THE TRAVELERS as subrogee of DORSON INC.,  
and EDDIE BAUER, INC.; THE HARTFORD  
INSURANCE CO. as subrogee of CROSS ISLAND  
TRADING CO., INC.; GREAT AMERICAN  
INSURANCE CO. as subrogee of DO IT BEST  
CORP.; and FIREMANS FUND INSURANCE  
COMPANY as subrogee of TRINITY GLASS  
INTERNATIONAL, INC.,

07 Civ. 3104 (RPP)

Plaintiffs,

-against-

**NOTICE OF MOTION**

M/V EASLINE TIANJIN, her engines, boilers, etc.;  
KAWASAKI KISEN KAISHA, LTD.; YANG  
MING MARINE TRANSPORT, LTD.; PHOENIX  
INTERNATIONAL FREIGHT SERVICES, LTD.;  
LAUFER FREIGHT LINES, LTD.; APL  
LOGISTICS; and HYUNDAI MERCHANT  
MARINE CO., LTD.,

Defendants.

-----X

PLEASE TAKE NOTICE that upon the annexed Declaration of Mr. Chris Paik executed the 4th day of July, 2007, the Exhibits annexed thereto and the accompanying Memorandum of Law and previous pleadings and proceedings heretofore had herein, defendant Hyundai Merchant Marine Co., Ltd. will move this Court before the Honorable Robert P. Patterson, United States District Judge, in Courtroom 24A, U.S. Courthouse 500 Pearl Street, New York, New York on the 13th day of August, 2007, pursuant to Federal Rule of Civil

Procedure 12b(1), (3) and/or (6) for an Order dismissing the Complaint on the ground of the forum selection clause set forth in Hyundai Merchant Marine bill of lading HDMUXGWB0110357 under and pursuant to which plaintiff Fireman's Fund Insurance Company as subrogee of Trinity Glass International, Inc. sues requires all suits to be brought before the Seoul Civil District Court in Korea and for such other further relief as to the Court may seem just and proper.

Dated: New York, New York  
July 18, 2007

**DEORCHIS, WIENER & PARTNERS, LLP**  
Attorneys for Defendant  
HYUNDAI MERCHANT MARINE CO., LTD.

By: /s/ Christopher H. Mansuy  
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Our File: 876-9

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